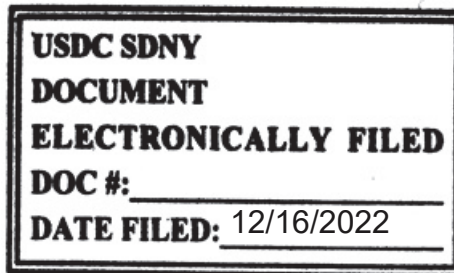


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Client: 13503-00001

December 16, 2022

VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Suite 1960
New York, NY 10007

Re: *Matter of Bulgari v. Bulgari*, No. 1:22-cv-05072-LGS

Dear Judge Lehrburger:

Defendant Veronica Bulgari requests an additional 7 days to file her response to Plaintiff's motion concerning certain evidentiary privileges with respect to Jan Boyer. This is Defendant's first request for an extension for the matter at issue.

Plaintiff's motion were served on Monday and our response is due next Monday, the 19th. The only senior associate at my firm working on this matter, Jennifer Bracht, underwent surgery in the last few days and has not been able to work until late yesterday. I have asked plaintiff's counsel to consent to this brief extension. They have replied that they do not object if we agree to certain deposition scheduling limitations. We may or may not ultimately agree to those limitations, but are not in a position to do so today, and do not believe it is appropriate to tie the two issues together.

Accordingly, we respectfully ask the Court to grant Defendant an additional 7 days to file her response. Because of the impending holidays, I have no objection to whatever extension of time beyond one week Plaintiff needs to submit her reply.

GIBSON DUNN

Hon. Robert W. Lehrburger
United States Magistrate Judge
December 16, 2022
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Respectfully,

/s/ Mitchell A. Karlan

Mitchell A. Karlan
Jennifer K. Bracht

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cc: All counsel of record (via ECF)

Request granted. Response due Dec. 26, 2022.

SO ORDERED:

12/16/2022



HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE